

COLIN L. COOPER, SBN 144291
KELLIN R. COOPER, SBN 172111
SETH MORRIS, SBN 244910
COOPER LAW OFFICES
800 Jones Street
Berkeley, California 94710
Telephone (510) 558-8400
Fax (510) 558-8401

Attorneys for Defendant
AISHAH BUENAVENTURA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case Nos. 17-CR-395-EMC-2
)	17-CR-401-EMC
Plaintiff,)	17-CR-402-EMC
)	
vs.)	
)	STIPULATION TO EXCLUDE TIME AND
AISHAH BUENAVENTURA,)	PROPOSED ORDER TO CONTINUE
)	STATUS CONFERENCE
Defendant.)	
)	
)	
)	
)	

This matter is currently set for a status conference on January 24, 2018, at 2:30 p.m. The parties hereby stipulate to vacate that date and reset the status conference for Wednesday, February 28, 2018, at 2:30 p.m. Defense counsel is requesting that the status conference be continued to February 28, 2018, at 2:30 p.m. in order for defense counsel to complete the review of all of the discovery provided in this case, discuss it with Ms. BUENAVENTURA, and adequately prepare the defense. A continuance of this status conference will allow defense counsel the reasonable time necessary for effective preparation.

1 The defendant and the government consent to the extension of time, and the parties
2 represent that good cause exists for this extension, including the effective preparation of counsel.
3 The parties agree that the time between January 24, 2018 and February 28, 2018 should be
4 excluded under the Speedy Trial Act pursuant to 18 U.S.C. §3161(h)(7)(A) and (h)(7)(B). The
5 parties also agree that the ends of justice are served by granting an extension of time and that an
6 exclusion of time outweighs the best interests of the public and the defendant in a speedy trial.
7 *See* 18 U.S.C. §3161(h)(7)(A).

8
9 SO STIPULATED.

10
11 Dated: January 18, 2018

_____/s/_____
COLIN L. COOPER
Attorney for AISHAH BUENAVENTURA

12
13
14 Dated: January 18, 2018

_____/s/_____
JULIE D. GARCIA
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

5)
6)
7 UNITED STATES OF AMERICA,)
8)

9 Plaintiff,

10 vs.

11 AISHAH BUENAVENTURA,

12 Defendant.
13

) Case Nos. 17-CR-00395-EMC-2

) 17-CR-00401-EMC

) 17-CR-00402-EMC
)

14 [PROPOSED] ORDER

15 For the reasons stated above, the Court continues the above entitled matters to
16 Wednesday, February 28, 2018, at the hour of 2:30 p.m. The court also finds that the exclusion
17 of this period from the time limits applicable under 18 U.S.C. §3161 is warranted, and that the
18 ends of justice served by the continuance outweigh the interests of the public and the defendant
19 in a speedy trial for the periods from January 24, 2018 and February 28, 2018, *See* 18 U.S.C.
20 §3161(h)(7)(A); and that the failure to grant the requested exclusion of time would deny counsel
21 for the defendant the reasonable time necessary for effective preparation and continuity of
22 counsel, taking into account the exercise of due diligence, and would result in a miscarriage of
23 justice. *See* 18 U.S.C. §3161(h)(7)(B)(iv).

24 **IT IS SO ORDERED.**

25 DATED: 1/19/18

